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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:

Amendment of Section 2.106 of the Commission's Rules to Allocate Spectrum for Wind Profeler Radar	)))	ET Docket No. 93-59 RM-8092

The Commission has proposed to allocate the 449 MHz band for wind profiler radar systems.

Experimental wind profilers have been operating at 404 MHz, but have interfered with certain satellite uplinks in an adjacent band. As a result of this interference, the National Telecommunications and Information Administration (NTIA) recommended that the wind profilers be accommodated at 449 MHz. The 449 MHz band that the Commission is proposing for wind profiler radars currently is allocated on a primary basis for Government radio-location operations. In addition, the 449 MHz band is allocated to: Amateur Radio Service, Government and non Government radio-location systems, and adjacent to Remote Broadcast Stations operating in the 450-451 MHz band. Due to the potential for interference to numerous Broadcast RPU licences, I strongly oppose the proposed allocation in the 449 MHz band.

The NTIA conducted a recent study and concluded that a separation of 30-50km would be required to preclude co-channel interference, and the operations most likely to be affected by the proposed wind profiler allocation are repeaters that operate in the 448-450 MHz band. The 450 band is heavily used in the Long Island and Tri-State area by broadcast stations.

The NTIA also examined the potential impact of wind profilers centered at 449 MHz on the Broadcast Remote Pickup Stations. The analysis concluded that the distance separation needed to preclude wind profiler interference to RPU ground operations is 5km for 450 MHz and 2km for 451 MHz.

According to the Director of the Office of Radio Frequency Management, NOAA, profilers "will be built in rural areas where electrical noise is reduced and land is cheaper". The first proposed site for the Profiler Radar System is Brookhaven Airport.

Brookhaven Airport is located in the center of the Town of Brookhaven. According to the 1992 Arbitron Nassau-Suffolk (Long Island), Radio Market Report, Nassau-Suffolk Counties is the 14th largest radio market in the country.

With a total population of 2,218,800, this is not a rural area. There are over 30 FM stations licensed to Long Island, with many of them also licensing Broadcast RPU frequencies for daily traffic reports, live radio broadcasts, News Department communications, Inter-City Relays, and transmitter telemetry control. To create the potential of harmful interference in this spectrum is grossly negligent.

During the summer months, this office receives over fifty requests for frequency coordination from Long Island, and the metropolitan area. In a 25 mile radius from Brookhaven Airport, the following licensed Radio Stations maintain a Broadcast RPU station:

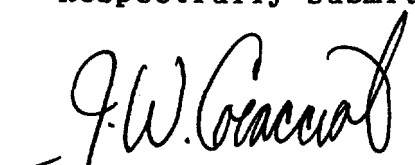
WALK	WCTO-FM	WLNG
WALK-AM	WGSM	WHFM
WBLI	WRCN	WWHB
WBAB-FM	WLIM	

The NTIA itself concluded that the use of 449 MHZ for the wind profiler system would create the potential for interference on the 448-450 MHz band. The study showed that the 440-450 MHz portion of the 440-450 MHz band contained the fewest number of Government assignments, and therefore offers the best potential location for the wind profilers. The study never considered the impact on the financially strapped medium market radio broadcaster.

Many of the stations on the east end of Long Island can not afford to upgrade or change RPU equipment. This is revenue generating equipment they depend heavily on. The adjacent channel interference that will effect the Broadcast RPU band will prevent the local broadcaster from using this equipment.

I do agree with the NTIA and the Commission that it is important to provide the spectrum for wind profilers. However, a national standard frequency would do more harm to others than any good that would come from the wind profiler system. The Commission must not allow the 449 MHz band to be used for this.

Respectfully submitted,



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